

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Strike 3 Holdings, LLC,	§	
	§	
Plaintiff,	§	Civil Action No. 2:21-cv-01373
vs.	§	
John Doe Subscriber Assigned IP Address	§	
173.49.152.42	§	Hon. Cynthia M. Rufe
	§	
Defendant.	§	
	§	

**JOINT STIPULATION FOR AN EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT**

Defendant, John Doe, by and through counsel, Leonard J. French, Esq., moves this Honorable Court for an extension of time to respond to Strike 3 Holdings, LLC's Complaint. Plaintiff, through counsel, stipulates to a 30-day extension and the existence of Good Cause. Defendant states the following in support of its motion:

1. Plaintiff Strike 3 Holdings served its Amended Complaint on Defendant on June 26, 2021.
2. A response to the Complaint is due on July 19, 2021.
3. Defendant has been attempting to settle the matter with Plaintiff.
4. Defendant believes that additional time could help facilitate the settlement of the matter.
5. Defendant is a public servant who has been deployed since June 30, 2021.
6. Defendant needs additional time to respond to Plaintiff's Complaint if the matter is unable to be settled.
7. The instant Motion is not intended to cause delay. No parties will be prejudiced by an extension of time.
8. This is Defendant's first request for an extension of time.

9. Plaintiff's counsel has given its consent to a 30-day extension of time.

10. The parties agree that Good Cause exists to grant the requested extension.

WHEREFORE, Defendant respectfully requests this Honorable Court enter the above proposed order, along with any other relief the court deems necessary, just, and proper.

Respectfully submitted,

/s/Leonard J. French

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Attorneys for Plaintiff

CERTIFICATE OF MOTION BEING UNCONTESTED

Pursuant to L. Civ. R. 7.1(b), I hereby certify that the relief sought in the within motion is uncontested.

Respectfully submitted,

/s/Leonard J. French

Leonard J. French, Esq.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of Courts using the CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

Respectfully submitted,

/s/Leonard J. French

Leonard J. French, Esq.